

IN THE UNITED STATES DISTRICT COURT  
OF THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

OCT 27 2003

SHAWN BROSSEAU, )  
                        )  
Plaintiff,         )  
                        )  
v.                     ) No. 02 C 2474  
                        )  
TRUMP CASINO CORPORATION and ) Magistrate Judge Sidney I. Schenkier  
HORNBLOWER MARINE SERVICES, )  
INC.,                 )  
                        )  
Defendants.         )

**NOTICE OF MOTION**

TO: Patrick J. Cullinan, Esq.  
Belgrade and O'Donnell, P.C.  
20 N. Wacker Drive  
Suite 1900  
Chicago, IL 60606  
FAX: 312/422-1717

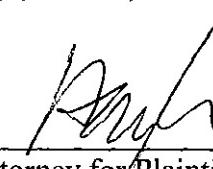
KC  
**FILED**

SEP 25 2003

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**PLEASE TAKE NOTICE** that on October 1, 2003, at 8:30 AM, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Sidney I. Schenkier, or any Judge sitting in his stead, in the courtroom usually occupied by him in Room 1700, at the U.S. Courthouse, Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois, and shall then and there present Plaintiff's Motion to Enforce Settlement.

Richard A. Haydu  
HOEY, FARINA & DOWNES  
542 South Dearborn Street  
Chicago, IL 60605  
(312) 939-1212

  
\_\_\_\_\_  
Attorney for Plaintiff

**PROOF OF SERVICE BY FAX AND BY MAIL**

I certify under penalty of perjury that I served this notice by faxing a copy to the fax number listed above and by mailing a copy to the above-named at the address(es) listed above and depositing same in the U.S. Mail at 542 S. Dearborn Street, Chicago, Illinois, prior to 5:00 PM, this 25<sup>th</sup> day of September, 2003.

  
\_\_\_\_\_  
3

IN THE UNITED STATES DISTRICT COURT  
OF THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SHAWN BROSSEAU, )  
v. )  
Plaintiff, )  
v. ) No. 02 C 2474  
TRUMP CASINO CORPORATION and ) Magistrate Judge Sidney I. Schenkier  
HORNBLOWER MARINE SERVICES, )  
INC., )  
Defendants. )

09/27/2003  
**FILED**  
SEP 25 2003  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**MOTION TO ENFORCE SETTLEMENT**

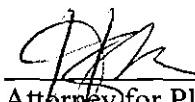
NOW COMES Plaintiff, SHAWN BROSSEAU, by and through attorneys, HOEY, FARINA & DOWNES, and moves this Court to enforce settlement entered into on September 5, 2003, as follows:

1. This matter was settled during a settlement conference before this Court on September 5, 2003.
2. The Court informed the parties that an order would be entered retaining jurisdiction for 30 days to enforce the settlement.
3. Although one-half of the total settlement amount has been paid to a structured settlement company to purchase an annuity for the Plaintiff pursuant to the terms of the settlement, the other half of the settlement remains unpaid and no releases or other settlement documents have been forwarded for approval and signature.
4. Plaintiff's counsel has called defense counsel to inquire as to what the hold up was and when funds and settlement paperwork could be expected, but no answer has been given.

5. Under the Court's order, the Court retains jurisdiction for another ten days after the drafting of this motion to enforce the settlement.

WHEREFORE, Plaintiff prays that this Court enter an order compelling Defendants to tender the settlement documents and the remaining settlement funds or, in the alternative, extending the time that this Court retains jurisdiction to enforce settlement should Defendant be unable for good cause to produce said documents and settlement funds within the allotted time.

Respectfully submitted,



\_\_\_\_\_  
Attorney for Plaintiff

Richard A. Haydu  
HOEY, FARINA & DOWNES  
542 S. Dearborn Street  
Suite 200  
Chicago, IL 60605  
(312) 939-1212